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February 11, 2002



MS. CARLYN WINTER PRISK (3HS11)
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION III
1650 ARCH STREET
PHILADELPHIA PA 19103-2029

FEB 19 2002

Re: Required Submission of Information
Lower Darby Creek Area Superfund Site – Clearview Landfill, Folcroft Landfill,
and Folcroft Landfill Annex

As you may be aware, your request for information dated November 6, 2001 and mailed to the Postmaster General in Washington, D.C. was not received until January 15, 2002. Apparently, your request was either held up in the Postal Service's Brentwood Mail Processing Facility, which was closed due to anthrax contamination, or was delayed due to irradiation procedures. On or about January 25, 2002, Brian Nishitani of your Office of Regional Counsel was contacted by Helen Nicholas, Deputy Managing Counsel of our Philadelphia Law Office of the reasons for the delay. Mr. Nishitani also related that he was amenable to providing the Postal Service with an extension of time to respond to your information request.

In regard to your information request, we conducted an investigation in an attempt to provide EPA with information relevant to the questions listed in enclosure "F" of the inquiry. Because you are seeking information from 1958 through 1976, we had little success in obtaining much of the requested information. Nonetheless, attached are the Postal Service's responses to your questions.

If you have any questions, please don't hesitate to contact me at (412) 494-2533.

JOE BARGER
ENVIRONMENTAL COMPLIANCE SPECIALIST
U.S. POSTAL SERVICE
5315 CAMPBELLS RUN ROAD
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RESPONSES TO QUESTIONS

1. Identify all persons currently or formerly employed by the USPS who have or may have personal knowledge of your operations and waste disposal practices between 1958 and 1976 at 30th Street and your other facilities in Philadelphia, Pennsylvania area. For each such person, state that person's employer, job title, dates of employment, current address, and telephone number. If the current telephone number or address is not available, provide the last known telephone number or last known address of such person.

RESPONSE:

Nick Marro, the current Manager, Maintenance Operations in the Philadelphia District of the U.S. Postal Service, indicated that the Postal Service employees who may have had knowledge of operations and waste disposal between 1958 and 1976 are: Alex Thistle, Nick Marro, Sr., John Robinson, Ted Anderson, and Orlando Ranieri. Unfortunately, these former employees are all believed to be deceased.

Harvey White, the current Manager of Human Resources at the Philadelphia District of the U.S. Postal Service, indicated that he believed that Charles Baugh was the Postmaster of Philadelphia and Harry Anderson was the General Foreman of the Vehicle Maintenance Facility on or about 1976. However, both employees have long since retired from the Postal Service and their current address and/or telephone numbers are unknown.

Ira Feldman, the current Manager of the Purchasing Material Service Center indicated that the following former employees might possibly have knowledge concerning operations and/or waste disposal in the Philadelphia Area during the pertinent time frame.

Jim Hayes (retired)

Title: Supervisor, Philadelphia Service Office

Dates of employment: Unknown

Address/Telephone No: Unknown

John Vitullo, (retired)

Title: Purchasing Specialist

Dates of employment: Unknown

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Address: Unknown

Telephone No: [REDACTED]

Al DiBerio (retired)

Title: Unknown

Dates of employment: Unknown

Address/Telephone No: Unknown

Carl W. Hollings (retired)

Title: Manager, Contracting

Dates of employment: Unknown

Address/Telephone No: Unknown

Catherine Naimoli (retired)

Title: Manager, Contracting

Dates of employment: Unknown

Address/Telephone No: Unknown

Michael DeSalis, (retired)

Title: Manager, Contracting

Dates of employment: Unknown

Address/Telephone No: Unknown

Hershel Moody (retired)

Title: Manager, Support Services

Dates of employment: Unknown

Address/Telephone No: Unknown

2. Describe the types of documents generated or maintained by your facilities in the Philadelphia, Pennsylvania area concerning the handling and/or generation, storage, treatment, transportation, recycling, formulation, or disposal of any hazardous substance, hazardous waste, pollutant, contaminant or other waste between 1958 and 1976.
 - a. Provide a description of the information included in each type of document and identify the person who was/is the custodian of the document.
 - b. Describe any permits or permit applications and any correspondence between your company and/or establishment(s), and any regulatory

agencies regarding the transportation and disposal of such wastes;
and

- c. Describe any contracts or correspondence between your company and/or establishment(s) and any other company or entity regarding the transportation and disposal of such wastes.

RESPONSE:

Prior to the enactment of the Postal Service Reorganization Act on or about 1970, the General Service's Administration ("GSA") owned the Postal Service's facility at 30th Street. While the exact contractual relationships regarding waste disposal prior to 1970 are not currently known, it is possible that waste disposal was a matter for which GSA had responsibility and control.

No information could be located concerning documents that were generated or maintained by postal facilities in Philadelphia, PA regarding the handling and/or generation, storage, treatment, transportation, recycling, formulation, or disposal of any hazardous substance, hazardous waste, pollutant, contaminant or other waste between 1958 and 1976.

3. Identify every hazardous substance used, generated, purchased, stored, or otherwise handled at your facilities in the Philadelphia, Pennsylvania area, including but not limited to 30th Street, between 1958 and 1976. Provide chemical analyses and Material Safety Data Sheets ("MSDS"). With respect to each such hazardous substance, further identify:
 - a. The process(es) in which each hazardous substance was used, generated, purchased, stored, or otherwise handled;
 - b. The chemical composition, characteristics, and physical state (solid, liquid, or gas) of each such hazardous substance;
 - c. The annual quantity of each such hazardous substance used, generated, purchased, stored, or otherwise handled;
 - d. The beginning and ending dates of the period(s) during which such hazardous substances was used, generated, purchased, stored, or otherwise handled;

- e. The types and sizes of containers in which these substances were transported and stored; and
- f. The persons or companies that supplied each hazardous substance to your company.

RESPONSE:

No information could be found regarding what, if any, hazardous substances were used, generated, purchased, stored, or otherwise handled at postal facilities in Philadelphia, PA including but not limited to 30th Street, between 1958 and 1976. No Material Safety Data Sheets could be found on file for the period in question.

- 4. Identify all by-products and wastes generated, stored, transported, treated, disposed of, released, or otherwise handled by your facilities in Philadelphia, Pennsylvania area, including but not limited to 30th Street, between 1958 and 1976. With respect to each such by-product and waste identified, further provide:
 - a. The process(es) in which each such by-product and waste was generated, stored, transported, treated, disposed of, released, or otherwise handled;
 - b. The chemical composition, characteristics, and physical state (solid, liquid, or gas) of each such by-product or waste;
 - c. The annual quantities of each such by-product and waste generated, stored, transported, treated, disposed of, released, or otherwise handled;
 - d. The types, sizes, and numbers of containers used to treat, store, or dispose of each such by-product or waste;
 - e. The name of the individual(s) and/or company(ies) that disposed of or treated each such by-product or waste; and
 - f. The location and method of treatment and/or disposal of each such by-product or waste.

RESPONSE:

No information could be located regarding by-products and wastes generated, stored, transported, treated, disposed of, released, or otherwise handled by Postal facilities in Philadelphia, Pennsylvania area, including the facility at 30th Street, between 1958 and 1976.

Because the United States Postal Service is not a manufacturing and/or processing oriented type of business, such by-products would not be created as a result of its operations.

5. Did the USPS company ever contract with, or make arrangements with Clearview, Folcroft, Folcroft Annex, Eastern Industrial, Tri-County Hauling, S. Buckley Trash Hauling, Baratt Rupurt, McCloskey Engineering, ABM Disposal Services, Marvin Jonas, Jonas Waste Removal, Paolino Company, Schiavo Bros., Inc. and/or any other company or municipality to remove or transport material from your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976 for disposal? If so, for each transaction identified above, please identify:
 - a. The person with whom you made such a contract or arrangement;
 - b. The date(s) on which or time period during which said material was removed or transported for disposal;
 - c. The nature of such material, including the chemical content, characteristics, and physical state (i.e., liquid, solid, or gas);
 - d. The annual quantity (number of loads, gallons, drums) of such material;
 - e. The manner in which such material was containerized for shipment or disposal;
 - f. The location to which such material was transported for disposal;
 - g. The person(s) who selected the location to which such material was transported for disposal;

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- h. the individuals employed with any transporter identified (including truck drivers, dispatchers, managers, etc.) with whom your establishment dealt concerning removal or transportation of such material; and
- i. Any billing information and documents (invoices, trip tickets, manifests, etc.) in your possession regarding arrangements made to remove or transport such material.

RESPONSE:

Prior to the enactment of the Postal Service Reorganization Act on or about 1970, the General Service's Administration ("GSA") owned the Postal Service's facility at 30th Street. While the exact contractual relationships regarding waste disposal prior to 1970 are not currently known, it is possible that waste disposal was a matter for which GSA had responsibility and control.

No documentary information under the control of the United States Postal Service could be located concerning contracts with the above-listed contractors concerning removal or transport material from any Postal facility in the Philadelphia area between 1958 and 1976.

Nick Marro, the current Manager, Maintenance Operations indicated during an interview that he possibly recalled the name of Tri-County Hauling that was involved with trash removal from the 30th Street facility. However, Mr. Marro was unsure if any such trash removal by Tri-County occurred between the years 1958 to 1976. Mr. Marro related that he came to the Maintenance Unit at 30th Street in August 1970. Mr. Marro could provide no information regarding the type of arrangement, if any, that Tri-County had with the Postal Service.

All persons who might possibly have had information regarding trash removal are believed to be deceased.

- 6. Provide the names, titles, areas of responsibility, addresses, and telephone numbers of all persons who, between 1958 and 1976, may have:
 - a. Disposed of or treated material at Clearview, Folcroft and Folcroft Annex or other areas of the Site;
 - b. Arranged for the disposal or treatment of materials at Clearview, Folcroft and Folcroft Annex or other areas of the Site; and/or

- c. Arranged for the transportation of materials to Clearview, Folcroft and Folcroft Annex or other areas of the Site (either directly or through transshipment points) for disposal or treatment.

RESPONSE:

Prior to the enactment of the Postal Service Reorganization Act on or about 1970, the General Service's Administration ("GSA") owned the Postal Service's facility at 30th Street. While the exact contractual relationships regarding waste disposal prior to 1970 are not currently known, it is possible that waste disposal was a matter for which GSA had responsibility and control.

No information could be found that would be responsive to this question.

- 7. For every instance in which your establishment(s) disposed of or treated material at Clearview, Folcroft and Folcroft Annex or other areas of the Site, or arranged for the disposal or treatment of material at the Site, identify:
 - a. The date(s) on which such material was disposed of or treated at the Site;
 - b. The nature of such material, including the chemical content, characteristics, and physical state (i.e., liquid, solid, or gas);
 - c. The annual quantity (number of loads, gallons, drums) of such material;
 - d. The specific location on the Site where such material was disposed of or treated; and
 - e. Any billing information and documents (invoices, trip tickets, manifests, etc.) in your company's or establishment's (s') possession regarding arrangements made to dispose of or treat such material at the Site.

RESPONSE:

The Postal Service is unable to locate or provide any information in response to this question.

8. Did you, or any other company or individual ever spill or cause a release of any chemicals, hazardous substances, and/or hazardous waste, and/or non-hazardous solid waste on any portion of Clearview, Folcroft and Folcroft Annex or any other portion of the Site? If so, identify the following:
- a. The date(s) the spill(s)/release(s) occurred;
 - b. The composition (i.e., chemical analysis) of the materials which were spilled/released;
 - c. The response made by you or on your behalf with respect to the spill(s)/release(s); and
 - d. The packaging, transportation, and final disposition of the materials which were spilled/released.

RESPONSE:

The Postal Service is unable to locate or provide any information in response to this question.

9. Please identify individuals employed by the USPS who were responsible for arranging for the removal and disposal of wastes, and individuals who were responsible for payments, payment approvals, and record keeping concerning such waste removal transactions at your Philadelphia, Pennsylvania area facilities, including but not limited to 30th Street, between 1958 and 1976. Provide current or last known addresses and telephone numbers where they may be reached. If these individuals are the same person identified by your answer to question 1, so indicate.

RESPONSE:

Prior to the enactment of the Postal Service Reorganization Act on or about 1970, the General Service's Administration ("GSA") owned the Postal Service's facility at 30th Street. While the exact contractual relationships regarding waste disposal prior to 1970 are not currently known, it is possible that waste disposal was a matter for which GSA had responsibility and control.

The individuals listed in response to question number 1 may have information in response to this question. No other information could be located.

10. Did you or any person or entity on your behalf ever conduct any environmental assessments or investigations relating to contamination at Clearview, Folcroft and Folcroft Annex or any other areas of the Site? If so, please provide all documents pertaining to such assessments or investigations.

RESPONSE:

To the best of our knowledge and belief, during the time period in question no such environmental assessments were conducted.

11. If you have any information about other parties who may have information which may assist the EPA in its investigation of the Site, including Clearview, Folcroft and Folcroft Annex, or who may be responsible for the generation of transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address, telephone number, type of business, and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.

RESPONSE:

Prior to the enactment of the Postal Service Reorganization Act on or about 1970, the General Service's Administration ("GSA") owned the Postal Service's facility at 30th Street. While the exact contractual relationships regarding waste disposal prior to 1970 are not currently known, it is possible that waste disposal was a matter for which GSA had responsibility and control. No documentary information could be located concerning such contracts.

12. Representative of the USPS:
 - a. Identify the person(s) answering these questions on behalf of your establishment(s), including full name, mailing address, business telephone number, and relationship to the company.

- b. Provide the name, title, current address, and telephone number of the individual representing your establishment(s) to whom future correspondence or telephone calls should be directed.

RESPONSE:

- a. Elizabeth A. Carter
2970 Market Street - Room 306-A
Philadelphia, PA 19104-9351
Telephone No. (215) 895-9330
Area Environmental Compliance Specialist

Joe Barger
5315 Campbells Run Road
Pittsburgh, PA 15277-7060
Telephone No. (412) 494-2533
Environmental Compliance Specialist
 - b. Helen A. Nicholas
Deputy Managing Counsel
U.S. Postal Service
Law Department
PO Box 40595
Philadelphia, PA 19197-0595
Telephone No. (215) 931-5070
13. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:
- a. Your document retention policy;
 - b. A description of how the records were/are destroyed (burned, archived, trashed, etc.).

- c. A description of the type of information that would have been contained in the documents; and
- d. The name, job title, and most current address known to you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

RESPONSE:

The USPS does not have any waste disposal contracts and/or financial billing documents in its possession for the period in question

- a. The document retention policy for contracts is currently 6 years after the contract expires. The document retention policy for financial billing documents is three years. It is not known if these policies applied for the period 1958 to 1976.
- b. The contracts are currently sent to the compactor. The financial billing documents are currently shredded. It is not known if these practices were followed for the period 1958 to 1976.
- c. Current Postal Service contract documents indicate supplier identification, pick up locations, frequency and price. The financial billing document would indicate the name of the requestor, date, supply purchase, quantity, unit price, total, justification, approval manager's signature, and signature of individual certifying funds available. It is not known if these practices were followed for the period 1958 to 1976.
- d. Unknown.